



Community Television

MANAGER
Tony Vigue

MEDIA SPECIALIST
Moe Amaral

November 11, 2015

Mr. Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Applications of Charter Communications, Inc., Time Warner Cable, Inc., and Advance/Newhouse Partnership for Consent to the Transfer of Control for Licenses and Authorizations (DN 15-149)

Dear Mr. Wheeler,

We are writing on behalf of South Portland Community Television. SPC-TV is a Department of the City of South Portland and serves approximately 7,000 Time Warner cable subscribers with two 24/7 PEG channels. We have been in operation since 1995 and in that time we have seen the number of cable operators in Maine reduced from 21 to 4. Time Warner currently holds approximately 93% of the cable franchises here in Maine, the only competition comes from two satellite companies which, as you know, do not offer PEG channels to their subscribers.

We are concerned about the impact that the proposed transactions will have on serving the public interest in our community. In the past, our communications with the cable operator in resolving franchise issues was handled locally but recently, many decisions that used to be made in the Portland office of Time Warner now have to be approved by their corporate offices. For example, we've seen a reluctance to accommodate our HD signal or even allow a reference to it becoming available in the wording of the forthcoming 15 year renewal franchise. Furthermore, if you don't have a TW digital receiver, you will find that our PEG channels have been shifted up into the 120 channel range instead of being grouped with other local broadcast channels on the basic tier. We are also seeing a change in how our return feeds are being processed. Instead of a dedicated fiber with equipment provided by the cable operator as they have done in the past, we understand TW is now proposing to charge municipalities for an encoder along with their Business Class service and routing PEG return signals over the internet to their head end, essentially shifting the cost of providing PEG access "facilities" (47 USC Secs. 531 & 542(g)(2)(D), & 544(b)(2)(A)) "sufficient to meet community cable-related needs and interests" - from the cable operator to the municipality.

Based on the demonstrated lack of importance that Charter places on PEG, (no mention of PEG obligations in their filings), we don't foresee this situation improving with the transfer of ownership. We humbly ask that you give this matter your most careful consideration.

Respectfully Submitted,

Tony Vigue

Tony Vigue
Manager

W. Maurice Amaral

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Media Specialist

Chris Dumais

Chris Dumais, Director
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Cc: FCC Commissioners: **Mignon Clyburn, Jessica Rosenworcel, Ajit Pai, Michael O'Reilly**

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